

Alla Kachan, Esq.  
Law Offices of Alla Kachan  
415 Brighton Beach Avenue, 2<sup>nd</sup> Fl.  
Brooklyn, NY 11235  
Tel.: (718) 513-3145

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re

Case Nos. 13-46160-NHL

ISAAK GRINMAN and  
GALINA GLADYSHEVA,

(Jointly Administered)

Debtor.

Chapter 11

-----X

**NOTICE OF MOTION TO SELL ASSETS OF ESTATE SUBJECT TO HIGHER OR  
BETTER OFFERS**

PLEASE TAKE NOTICE that upon the application of Alla Kachan, Esq., as attorney for the Debtors-in-Possession (hereinafter, "DIPs") for the Jointly Administered Estates of Isaak Grinman and Galina Gladysheva (hereinafter, "Estates"), dated April 14, 2014, the undersigned will move this Court before the Honorable Nancy H. Lord, at the United States Bankruptcy Court, 271 Cadman Plaza, Brooklyn, New York 11201, on May 20, 2014 at 3:00 P.M., or as soon thereafter as counsel may be heard, for an Order:

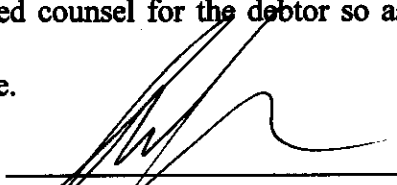
(a) pursuant to 11 U. S. C. § 363(b) and Fed. Bankr. R. 6004, authorizing the DIPs to sell the Estates' rights, title and interests in the business known and operated as Modern Dental Care, P.C. (hereinafter, "MDC"), located at 1216 Foster Ave, Brooklyn NY 11230, a dental practice, for the aggregate sum of \$10,000.00, subject to any and all liens, encumbrances, claims and other interests, and subject to higher or better offers;

(b) authorizing the DIPs to take all steps and to execute any and all documents necessary to fully effectuate the sale of MDC; and

(c) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that any objection to the within Motion must be in writing and must state with particularity the grounds of the objection. The objection must be filed with the Clerk of the Bankruptcy Court electronically at [www.nyeb.uscourts.gov](http://www.nyeb.uscourts.gov), and a copy of the objection must be served upon the undersigned counsel for the debtor so as to be received no later than seven (7) days before the hearing date.

Dated: Brooklyn, New York  
April 25, 2014



---

Alla Kachan, Esq.  
Law Offices of Alla Kachan  
415 Brighton Beach Avenue, 2<sup>nd</sup> Fl.  
Brooklyn, NY 11235  
Tel.: (718) 513-3145

Alla Kachan, Esq.  
Law Offices of Alla Kachan  
415 Brighton Beach Avenue, 2<sup>nd</sup> Fl.  
Brooklyn, NY 11235  
Tel.: (718) 513-3145

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re Case Nos. 13-46160-NHL  
  
ISAAK GRINMAN and (Jointly Administered)  
GALINA GLADYSHEVA,  
  
Debtor. Chapter 11  
-----X

**AFFIRMATION IN SUPPORT OF MOTION TO SELL SUBJECT TO HIGHER OR  
BETTER OFFERS**

The Debtors-in-Possession in this Jointly Administered Chapter 11 case, Isaak Grinman and Galina Gladysheva, (hereinafter, "DIPs") by counsel, Alla Kachan, Esq., request that, pursuant to 11 U. S. C. § 363(b) and Fed. R. Bankr. P. 6004, the Court enter an Order authorizing the DIPs to sell an asset of the jointly administered estates, subject to higher or better offers, and in support thereof avers as follows:

1. On October 11, 2013, this case was commenced by the filing of a voluntary petition for relief under chapter 7 of the Bankruptcy Code by Isaak Grinman in the United States Bankruptcy Court for the Eastern District of New York (the "Bankruptcy Court").
2. By Order of this Court, dated February 6, 2014, this case was converted from one under chapter 7 to a case under chapter 11. See ECF Doc. No. 27.
3. Debtor Galina Gladysheva commenced her case by the filing of a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of New York, Case No. 14-40341-NHL.

4. A motion to jointly administer these two chapter 11 cases was returnable on March 25, 2014, and provisionally granted.

5. The DIPs intend to continue in the possession of property as Debtors-in-Possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

6. In the Schedule B originally filed by DIP Isaak Grinman, it was disclosed that he owned a one-hundred percent interest in a dental practice known as Modern Dental Care, P.C. (hereinafter, "MDC").

7. The estate of Galina Gladysheva, however, wife of Isaak Grinman, may also own an interest in MDC.

8. In the referenced Schedule B, Debtor-in-Possession Isaak Grinman listed MDC with a value of \$0.00.

9. The DIPs, along with counsel, have conducted an investigation to make a determination as to the estimated fair market value of MDC. Based upon discussions with parties, the DIPs have determined that the fair market value of the MDC practice is \$10,000.00.

10. The DIPs do not believe that there exist any liens or encumbrances against MDC, including its furniture.

11. For the Court's reference, the DIPs have discussed sale of MDC with the following parties, and any offers which may have been made: Dr. Kaufman \$10,000.00.

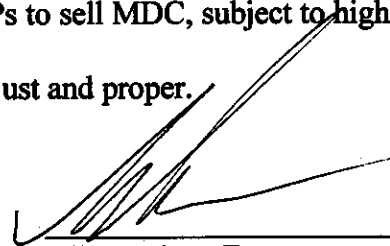
12. As no issues of law exist, the DIPs are requesting that the Court dispense with the requirement that a memorandum of law accompany this application. DIPs, however, request the

preservation of their right to submit a memorandum of law to the Court in the event any party files an objection to this motion.

13. No prior relief sought herein has been requested in this or any other Court.

WHEREFORE, the DIPs in this jointly administered chapter 11 case respectfully request that the Court enter an Order authorizing the DIPs to sell MDC, subject to higher or better offers, and for such other relief which the Court deems just and proper.

Dated: Brooklyn, New York  
April 25, 2014



---

Alla Kachan, Esq.  
Law Offices of Alla Kachan  
415 Brighton Beach Avenue, 2<sup>nd</sup> Fl.  
Brooklyn, NY 11235  
Tel.: (718) 513-3145

Alla Kachan, Esq.  
Law Offices of Alla Kachan  
415 Brighton Beach Avenue, 2<sup>nd</sup> Fl.  
Brooklyn, NY 11235  
Tel.: (718) 513-3145

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re

Case Nos. 13-46160-NHL

ISAAK GRINMAN and  
GALINA GLADYSHEVA,

(Jointly Administered)

Debtor.

Chapter 11

-----X  
**ORDER AUTHORIZING THE DIPs TO SELL ASSET OF THE ESTATES SUBJECT  
TO HIGHER OR BETTER OFFERS**

Upon the Motion of Isaak Grinman and Galina Gladysheva, the Debtors-in-Possession in this Jointly Administered chapter 11 case (hereinafter, "DIPs"), by counsel, Alla Kachan, Esq. of the Law Offices of Alla Kachan, P.C., seeking entry of an Order authorizing the estates of the DIPs to sell an asset of the estates, Modern Dental Care, P.C.; and upon the Affirmation of Alla Kachan, Esq.; and upon all the prior papers and proceedings had herein; and the Court having jurisdiction to consider this Motion; and the Court finding good sufficient cause appearing therefore, it is

ORDERED that the Debtors-in-Possession, Isaak Grinman and Galina Gladysheva, are hereby authorized to sell a dental practice, Modern Dental Care, P.C., subject to higher or better offers; and

ORDERED that this Court shall retain jurisdiction with respect to any matters relating to or arising from implementation of this Order

**Dated:**

---

**Hon. Nancy H. Lord, U. S. B. J.**